

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

2023 NOV 14 P 2:55

Plaintiff,

SEALED

v.

Case No. 23-CR-

23-CR-211

[18 U.S.C §§ 2(a), 922(g)(1),
924(a)(8), & 924(c); 21 U.S.C. §§
841(a)(1), 841(b)(1)(A),
841(b)(1)(B), 841(b)(1)(C),
& 846]

JAMES A. DAVIS,
LAJUAN J. GRAHAM, and
BROOKE DOUGHTY,

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Beginning by at least January 1, 2022, and continuing until on or about May 1, 2023, in the State and Eastern District of Wisconsin,

JAMES A. DAVIS,
LAJUAN J. GRAHAM, and
BROOKE DOUGHTY,

knowingly and intentionally conspired with each other and others, known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The amount of controlled substances involved in the conspiracy attributable to

██████████, James A. DAVIS, and LaJuan J. GRAHAM, as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to each of them, included 400 grams or more of a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

15-70-05
All in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A), and 841(b)(1)(C), and Title 18, United States Code, Section 2(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about January 27, 2022, in the State and Eastern District of Wisconsin,


**JAMES A. DAVIS, and
LAJUAN J. GRAHAM**

knowingly and intentionally distributed a controlled substance.

2. The offense involved 40 grams or more of a mixture and substance containing N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propanamide (fentanyl), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about March 24, 2022, in the State and Eastern District of Wisconsin,

[REDACTED] and
BROOKE E. DOUGHTY

knowingly and intentionally distributed of a mixture and substance containing N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propanamide (fentanyl), Schedule II controlled substance.

2. The amount of controlled substances involved as to [REDACTED] included 40 grams or more of a mixture and substance containing N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propanamide (fentanyl), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C), and Title 18, United States Code, Section 2(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about June 9, 2022, in the State and Eastern District of Wisconsin,

[REDACTED] and
BROOKE E. DOUGHTY

knowingly and intentionally distributed of a mixture and substance containing N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propanamide (fentanyl), a Schedule II controlled substance, and a mixture and substance containing heroin, a Schedule I controlled substance.

2. The amount of controlled substances involved as to [REDACTED] included 40 grams or more of a mixture and substance containing N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propanamide (fentanyl), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C), and Title 18, United States Code, Section 2(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about February 23, 2023, in the State and Eastern District of Wisconsin,

[REDACTED]

knowingly and intentionally possessed with intent to distribute controlled substances.

2. The offense involved 40 grams or more of a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, and a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2023, in the State and Eastern District of Wisconsin,

[REDACTED]

knowingly possessed a firearm in furtherance of the drug trafficking offenses charged in Counts One and Five of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about February 23, 2023, in the State and Eastern District of Wisconsin,

[REDACTED]

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms which, prior to his possession of each, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms are more fully described as follows:
- a. a silver Beretta 9mm semi-automatic pistol, bearing serial number BER122506; and
 - b. a Taurus 9mm semi-automatic handgun, bearing serial number ADG527279.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE NOTICE

1. Upon conviction of any offense in violation of Title 21, United States Code, Sections 841(a)(1) and 846, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses. The properties subject to forfeiture include but are not limited to \$2,695 located on February 23, 2023 at XX11 North 89th Street, Milwaukee, Wisconsin, and one red Polymer 80 handgun located on February 23, 2023, at XX51 North 48th Street, Milwaukee, Wisconsin.

2. Upon conviction of any offense in violation of Title 18, United States Code, Section 922(g) and 924(c), defendant [REDACTED] shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the offenses of conviction. The properties subject to forfeiture include, but are not limited to:


- a. a silver Beretta 9mm semi-automatic pistol, bearing serial number BER122506, located on February 23, 2023 at XX11 North 89th Street, Milwaukee, Wisconsin;
- b. one Pro Mag 9mm extended drum pistol magazine located on February 23, 2023, at XX11 North 89th Street, Milwaukee, Wisconsin;
- c. a 9mm pistol magazine with one 9mm round located on February 23, 2023, at XX11 North 89th Street, Milwaukee, Wisconsin;
- d. a 9mm pistol magazine located on February 23, 2023, at XX11 North 89th Street, Milwaukee, Wisconsin;
- e. a .22 caliber pistol magazine with 15 rounds of .22 caliber unspent ammunition located on February 23, 2023, at XX11 North 89th Street, Milwaukee, Wisconsin;
- f. a Taurus 9mm semi-automatic handgun, bearing serial number ADG527279 located on February 23, 2023, at XX51 North 48th Street, Milwaukee, Wisconsin;
- g. two handgun magazines located on February 23, 2023, at XX51 North 48th Street, Milwaukee, Wisconsin; and
- h. six rounds of 9mm ammunition located on February 23, 2023, at XX29 North 55th Street – Lower, Milwaukee, Wisconsin.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).



FOREPERSON

Date: 14 Nov 2023



GREGORY J. HAANSTAD
United States Attorney